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Features

Federal Agencies and the National Historic Preservation Act:
An Overview..... 1
Bruce J. Noble, Jr.

The Role of the Federal Preservation Officer
in the Fish and Wildlife Service..... .6
Kevin Kilcullen

The Federal Preservation Forum
and the Federal CRM Program..... 7
Brit Allan Storey

Windows on the Past
The Forest Service Works with the Public to Understand
and Preserve Our Past to Understand Our Future..... 9

Linda Marie Lux
Leslie E. Wildesen

Cultural Resources Management in National Parks..... 12
Laura Feller

Intrigue of the Past
Utah's Archeology Education Program14
Shelley Smith

The Cultural Resources Program
of the Soil Conservation Service.....16
Michael J. Kaczor

Preservation Planning on Army Installations..... 17
Constance Werner Ramirez

Evaluating and Documenting Traditional Cultural Properties.... 19
Jan Townsend

Have You Dug Up Anything Neat?
The Role and Function of the Interagency
Archeological Services Division, NPS, Southeast Region..... 20
John E. Ehrenhard

Federal Contracting in Cultural Resource Management:
A Contractor's Perspective..... 22
Rick Minor

The Business of Consulting..... 24
Clayton B. Fraser

Viewpoint
Where to Now?.....25
Brit Allan Storey

The Federal CRM Mandate— Responses to the Challenge

Federal Agencies and the National Historic Preservation Act: An Overview

Bruce J. Noble, Jr.

The magnitude of Federal agency historic preservation responsibilities cannot be underestimated. Federal agencies control one-third of the land in the United States and

another one-third of the national land mass is impacted by Federal programs. As these figures suggest, an extensive array of historic and archeological resources fall under Federal agency jurisdiction. Given both the substantial geographic area and the broad range of resources, Federal agencies face a tremendous management task with respect to their cultural properties.

Federal agencies have responded to this management challenge by initiating a wide range of historic preservation programs. To capture a sense of the diversity that characterizes these programs, this entire issue of CRM is devoted to Federal agency historic preservation activities. Although no single issue of CRM can hope to achieve total comprehensiveness, readers will receive valuable insight into the historic preservation agenda of several Federal agencies. Before turning to an overview of the articles in this issue, this introductory piece will provide a brief history of the evolution of Federal agency historic preservation programs.

The origin of Federal Government-sponsored preservation efforts can be traced to such events as the founding of Yellowstone National Park in 1872 and the signing of the Antiquities Act in 1906. The Historic Sites Act of 1935 gave a further boost to the Federal preservation program by authorizing the National Park Service to survey the country for nationally significant properties worthy of designation as National Historic Landmarks. However, many cultural resources significant at either the state or local level faced a severe threat during the post-World War II years as Federal Government development activities accelerated dramatically. Government-sponsored programs emphasizing dam and reservoir construction, interstate highway building, and urban renewal all took their toll on the Nation's historic and archeological fabric. Not surprisingly, preservation advocates began working to enact legislation to reverse this trend.

Congress responded and passed the National Historic Preservation Act of 1966 (hereafter referred to as NHPA). NHPA included two components specifically designed to minimize the impact of Federal activities on cultural resources: a new National Register would include properties significant at the national, state, and local levels and the Advisory Council on Historic Preservation was created to review Federal activities which might threaten properties listed in the National Register. In addition, NHPA established the foundation for a national union of state historic preservation programs. NPS would provide funding through a matching grant program enabling state governments to establish an administrative mechanism for identifying non-Federal historic properties and to provide guidance to Federal agencies undertaking projects affecting historic properties in their state.

The implementation of NHPA quickly unveiled problems regarding its applicability to Federal agencies. Although agencies might own properties eligible for the National Register or conduct programs with a potential for affecting such properties, NHPA included no requirement that agencies actually nominate these properties. Because of this fact, agencies could essentially ignore NHPA. In the meantime, because the Advisory Council could not review projects when virtually no properties were listed in the National Register, the National Park Service could only attempt to influence Federal agency historic preservation programs by encouraging them to nominate properties for Register listing.

This situation changed dramatically when President Nixon signed Executive Order 11593 in 1971. E.O. 11593 established a Government-wide mechanism for determining properties eligible for the National Register, rather than waiting for properties to be formally listed. As a result, Federal agencies could no longer simply ignore their historic preservation responsibilities. All agencies now had to consult with the Advisory Council regarding the potential impact of their projects on any property eligible for the National Register-formally listed or not.

E.O. 11593 greatly enlarged the historic preservation responsibilities of Federal agencies and led to a parallel expansion of the Advisory Council's role. In response to this evolving situation, the Advisory Council published their first procedural regulations regarding the Section 106 process in 1974. Subsequent revisions to these regulations have tightened the process to the point that Section 106 compliance has become a major focus of Federal agency preservation activities.

At present, the National Register continues to play a traditional role in the Federal historic preservation program. During the past 20 years, the National Park Service has continued to encourage Federal agencies to nominate properties to the National Register. At the end of 1991, the National Register included 3,936 Federal properties. This means that Federal properties account for 6.7% of the total number of National Register listings.

The legacy of E.O. 115Y~ is that most agencies prefer to determine properties eligible for the Register, rather than nominate them. In the course of carrying out their Section 106 compliance responsibilities, agencies and State Historic Preservation Offices can expeditiously reach eligibility decisions simply by agreeing that a property is significant. The National Register criteria continue to play an important role in reaching these determinations, but the Section 106 process has become the primary vehicle through which Federal agencies identify historic properties. For example, in 1991 SHPOs conducted over 77,000 Federal project reviews under Section 106. These projects resulted in the identification of 14,000 properties eligible for the National Register.

Another milestone in the development of Federal agency historic preservation programs was reached in 1980, when much of the substance of E.O. 11593 became part of NHPA through amendments to the legislation. This portion of the law is commonly known as Section 110. In 1988, the "Section 110 Guidelines" appeared in the Federal Register. These guidelines provided Federal agencies with a detailed formula for developing effective and comprehensive historic preservation programs. In addition, Section 110 provides agencies with the mandate to broaden the scope of their historic preservation activities by ensuring "that historic preservation is fully integrated into the[ir] ongoing programs and missions." Although preparing National Register nominations and complying with Section 106 remain vital components of Federal agency programs, the articles compiled in this issue of CRM will attempt to provide a sense of the broad range of historic preservation activities that Federal agencies engage in today.

This issue of CRM begins with a look at the role of an agency's Federal Preservation Officer. Section 110(c) directs each Federal agency to designate a "preservation officer" as the person "who shall be responsible for coordinating their agency's activities" under NHPA. Kevin Kilcullen has provided an article which outlines his major responsibilities as Federal Preservation Officer for the U.S. Fish and Wildlife Service. Kevin indicates that this position is not lacking in challenges. To cite only one example, all Federal Preservation Officers must strive to uphold a multitude of historic preservation laws. Although NHPA alone directs Federal agencies to appoint a Federal Preservation Officer, each Federal Preservation Officer must conduct his/her programs in accordance with the Archeological Resources Protection Act, the Native American Graves Protection and Repatriation Act, the American Indian Religious Freedom Act, and other assorted legislation.

Brit Storey, Senior Historian for the Bureau of Reclamation in Denver, has provided an article that describes both the birth and the major accomplishments of a new organization called the Federal Preservation Forum. As their respective programs became increasingly sophisticated, many Federal agency historic preservation professionals began to recognize the importance of organizations like the National Conference of State Historic Preservation Officers (NCSHPO). NCSHPO occupies an important niche by bringing together a nationwide constituency of SHPOs to share expertise and work collectively on achieving national objectives. To meet a similar need, a number of Federal agencies participated in a December 1989 meeting that led to the formation of the Federal Preservation Forum. The membership of this new organization is open to both Federal Preservation Officers and other historic preservation professionals employed by the Federal Government.

Linda Lux and Leslie Wildesen of the U. S. Forest Service have provided an overview of their agency's historic preservation programs. The authors note how the growing public interest in multiculturalism has stimulated greater appreciation for the diverse peoples who inhabited Forest Service lands during the historic and prehistoric periods. In addition, contemporary enthusiasm for activities like "heritage tourism" has begun to suggest a new mission for the Forest Service that is not entirely timber-based.

Laura Feller describes the historic preservation program used throughout our national park system. The Secretary of the Interior has delegated a large and complex historic preservation mission to the National Park Service. Through the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation and other guidance documents, the National Park Service must provide basic historical and archeological policy direction to all Federal agencies and all State Historic Preservation Offices. In addition to this huge mandate, the cultural resources of the national parks must be properly documented and protected. Laura describes the program the National Park Service has developed to ensure effective management of cultural resources in the national parks.

In her article, Shelley Smith of the Bureau of Land Management (BLM) in Utah describes the growing emphasis that Federal agencies are placing on historic preservation education. She specifically focuses on a BLM-sponsored archeology education program underway in Utah. Known as "Intrigue of the Past," this project focuses on incorporating archeological studies into secondary school curricula. Among other things, the intent of this program is to foster a sense of stewardship in young students that will ultimately lead to a reduction of archeological site vandalism. The success of "Intrigue of the Past" in Utah has encouraged BLM to seek to implement the program in other states as well.

Mike Kaczor of the Soil Conservation Service (SCS) provides a general overview of activities conducted by his agency's historic preservation program. In particular, he discusses a very successful initiative to provide historic preservation training to SCS employees. This training effort is organized around a series of video modules that will eventually be presented to nearly 10,000 SCS employees. This training program will greatly enhance the ability of SCS to conduct their basic program activities in a manner that allows for recognition and protection of important historic and archeological resources.

Many Federal agencies now recognize the utility of preparing plans as a means of carrying out their historic preservation responsibilities in a proactive manner. Constance Ramirez, Historic Preservation Officer for the Army, offers a discussion of current historic preservation planning initiatives being undertaken by the Army. She points out the necessity of incorporating historic preservation data into broader land and real property planning processes. Only by accomplishing this objective can historic preservation data play an important role in protecting significant properties from development projects.

Tangible properties associated with Native American cultures and traditions have become an increasingly important component of the national historic preservation program. Federal agencies must be particularly sensitive to these issues because of the number of Native American groups that have ancestral ties to lands that are now under Federal jurisdiction. To provide some guidance on this complex issue, the National Register recently issued Bulletin 38 titled Guidelines for Evaluating and Documenting Traditional Cultural Properties. Jan Townsend, the National Register staff archeologist, has written an article that helps to clarify some misconceptions about the use of this bulletin in identifying and evaluating traditional cultural properties.

John E. Ehrenhard of the National Park Service offers an overview of the activities conducted by the Interagency Archeological Services Division of the Southeast Regional Office. Part of the mandate of the National Park Service involves providing technical and professional historic preservation assistance to other agencies of the Federal Government. This function does not relieve Federal agencies of the obligation to develop their own internal historic preservation programs, but rather offers the agencies a source of assistance in addressing very specialized issues. Many of these specialized issues relate to proper management of archeological resources under Federal jurisdiction. In the process of describing his own program in the Southeast Regional Office, John Ehrenhard also offers a concise description of the overall National Park Service program for providing various forms of archeological assistance.

In many cases, the Federal Government turns to private contractors as a means of accomplishing legally binding historic preservation mandates. Thus, this issue of CRM includes two articles reflecting the perspectives of consultants who frequently work under

contract for Federal agencies. Rick Minor, an archeologist with Heritage Research Associates in Eugene, Oregon, points out that many established consulting firms offer a valuable source of continuity to Federal agencies based on 20 years of work experience with the Government. However, as "outsiders" to the Federal Government, contractors sometimes face difficult obstacles. For example, Clayton Fraser, a historical architect with Fraser Design in Loveland, Colorado, describes the frustrations experienced by consultants who submit final reports for approval and then encounter a laborious review process that seems to emphasize form over substance. He also points to a need for greater consistency in Government contracting practices. Although every story has two sides, it is important that Federal agencies and private contractors understand each other's concerns to assure that monies spent and activities undertaken meet the objectives of the national historic preservation program.

Finally, Brit Storey contributed a second article that advocates a major reevaluation of the Federal agency response to the National Historic Preservation Act of 1966. His own evaluation has led to the following conclusion: "The Federal 'cultural resources management' program does not focus its time, energy, and monies on cultural resources. Instead, it focuses those resources on projects." In his view, the emphasis on project mitigation can stand in the way of proactive efforts to preserve important resources that do not happen to fall in the path of an impending project. Brit concludes by calling for a national "working conference" that will define new directions for Federal agency historic preservation programs.

Although Brit Storey raises a justifiable point by encouraging the adoption of new strategies to enhance the collective ability of Federal agencies to accomplish their historic preservation mission, many agencies have already begun to move beyond the traditional parameters of the program. In fact, as mentioned at the outset of this article, no single issue of CRM could hope to encompass the full range of historic preservation activities carried out by Federal agencies today. This issue has attempted to provide a sample of those activities, but there have undoubtedly been some unintentional omissions. For example, some readers may correctly point out that more attention could have been paid to programs conducted by building managing agencies and regulatory agencies. Hopefully, representatives of those programs will feel free to submit articles for future publication in CRM. In the meantime, the articles compiled in this issue should amply demonstrate the progress that Federal agencies have made toward fulfilling the mandate articulated in E.O. 11593 to "provide leadership in preserving, restoring and maintaining the historic and cultural environment of the Nation."

Bruce Noble is a historian in the Planning Branch of the Interagency Resources Division of the National Park Service, Washington Office. As Federal programs liaison in the Planning Branch, Mr. Noble coordinates a variety of activities designed to support Federal agency efforts to achieve their respective missions in a manner compatible with Section 110 of the National Historic Preservation Act. Mr. Noble coordinated this issue of CRM and served as guest editor.

The Role of the Federal Preservation Officer in the Fish and Wildlife Service

Kevin Kilcullen

"The head of each Federal agency shall, unless exempted under section 214, designate a qualified official to be known as the agency's 'preservation officer' who shall be responsible for coordinating the agency's activities under this Act." (Section 110(c), National Historic Preservation Act of 1966, as amended)

This language from the 1980 amendments to the National Historic Preservation Act (Act), creates a focal point within Federal agencies for coordinating historic preservation activities. Although not officially recognized as "preservation officers," many Federal agencies had already begun to employ professionals and develop programs much earlier in response to the 1974 publication of the Advisory Council on Historic Preservation's regulations, 36 CFR 800.

While the specific responsibilities of preservation officers depend largely on the mission and objectives of each agency, most share the following common elements:

- providing advice and recommendations to the head of his or her agency on meeting the various requirements of the Act;
- acting as an official point of contact for agency-wide historic preservation activities involving National Register properties and communication with the Advisory Council on Historic Preservation and other organizations;
- developing agency guidance and assisting in the completion of activities associated with the agency's historic preservation program.

Funding and administrative support for Fish and Wildlife Service (FWS) activities is organized largely along program lines. Major programs include research, refuge management, fisheries assistance and fish hatchery management, and funding and technical assistance to states, tribal governments, and individuals. As a result, the Federal Preservation Officer (FPO) has never truly occupied a central position within the agency. Currently, the FPO's responsibilities fall under the Assistant Director for Refuges and Wildlife and the refuge management program. This makes oversight and coordination with other programs difficult at times, but results in historic preservation functions being more closely integrated with the agency's land management program that accounts for over 90% of the funding for cultural resource projects and Section 106 compliance activities.

While the notion of the FPO stems from the Act's 1980 amendments, in reality the position oversees the implementation of a broader range of cultural resource management requirements. The FWS is responsible for not only meeting the requirements of Sections 106 and 110, but also the various elements of the Archaeological Resources Protection Act, the Antiquities Act, the Native American Graves Protection and Repatriation Act, and other laws and regulations. The challenge is to mesh these cultural resource mandates within the overall mission, objectives, and framework of the agency so that a comprehensive set of management policies are available to guide agency planning and decisionmaking.

The NHPA's Section 110 guidelines, published in the Federal Register in February 1988, provide information and recommendations that are useful in determining the responsibilities of agency FPOs. In particular, the idea of designating regional or area preservation officers to handle activities has been employed successfully by the Fish and Wildlife Service for years. The agency's decentralized organizational structure makes it impossible for an individual or a staff in one office to oversee programs and activities carried out by 8 regional offices, over 500 field stations, 18 research facilities, and over 90 million acres of land. A "Regional Historic Preservation Officer" (either an archeologist or historian)

has been designated in each FWS region to coordinate with the agency's preservation officer and State Historic Preservation Offices on important issues and to assist field station managers in meeting regulatory requirements and completing projects.

In addition to responsibilities under NHPA, Fish and Wildlife Service regional offices are charged with issuing archeological permits for study and research under ARPA and the Antiquities Act; coordinating with Native American tribes and groups; monitoring contracts involving cultural resource studies; and arranging loans and maintaining contact with facilities that store Federal archeological and historical collections. Further, many FWS field station managers help coordinate cultural resource activities involving law enforcement to deter the looting of archeological sites; monitoring the progress of cultural resource studies and integrating them with other field station management activities; and, assisting the Regional Historic Preservation Officer in the identification and protection of cultural resources. All of these functions should fall under the responsibilities of the agency preservation officer, but have been delegated by necessity throughout the organization.

While Section 110(c) of the Act has been a very useful tool in directing the coordination of diverse agency historic preservation activities, its importance lies in the broader programmatic context of the Act and other statutes. Effective coordination and oversight cannot exist without a historic preservation program that is accepted as part of the agency's organizational structure and responsive to the management objectives of various administrative levels.

Kevin Kilcullen is the headquarters archeologist and Federal Preservation Officer for the U.S. Fish and Wildlife Service.

The Federal Preservation Forum and the Federal CRM Program

Brit Allan Storey

During a talk at a professional meeting in the spring of 1989, Constance Ramirez, preservation officer for the Army, pointed out that the Federal agencies' CRM personnel have never organized. The Federal agencies made no concerted effort to participate in shaping and directing the Federal CRM program. Given the large amounts of staff, time, energy, and budget consumed by the CRM program, it seemed logical that the agencies should organize. Many agencies, with a large aggregate CRM personnel, reacted to the Federal program but did not actively play a role in shaping the program.

Other participants in the CRM program were much better organized. The State Historic Preservation Officers (SHPOs) had the National Conference of State Historic Preservation Officers (NCSHPO). The external programs of the National Park Service and the Advisory Council were both relatively small, autonomous, semi-regulatory entities with good internal communications systems to meet their organizational needs.

There were only a few vehicles for Federal agencies to disseminate information among themselves-the most notable being the National Park Service's CRM Bulletin and the Federal Archeology Report. Those, by their nature, were largely internal Park Service vehicles (though they have since significantly expanded their scope).

The other information dissemination by both the Park Service and the Advisory Council was largely unilateral-the transmission of draft regulations and guidance for comment and then the transmittal of final regulations and guidance. Revisions to those draft materials were undertaken by the semi-regulatory Advisory Council and National Park Service in accordance with existing practice but without effective dialogue among (as opposed to comment by) the affected Federal agencies. There is a significant difference between a partnership with the Federal agencies actively participating in a dialogue to develop a draft for comment by Federal agencies, SHPOs, and the interested public; and, the significant encumbrances to dialogue inherent in being on the receiving end of a "draft" for comment. The reality is that "drafts" are often the best work of the responsible agency without outside input, and they result in hard-to-break mindsets. If the Federal agencies are to be effective "partners" in the process, it is necessary to establish multilateral dialogue among the major participants.

The Federal agencies did not effectively communicate with one another or with the Advisory Council and National Park Service about their successes, failures, and innovations in the system. The idea of an organization is based on the premise that sharing our experiences, at all levels of agency organization, would improve our programs and permit us to make them more effective, economical, and efficient. In large part, communications in the Federal CRM program were within agencies or between the agencies and the Advisory Council and the Park Service. There was little communication among the Federal agencies about their common needs, objectives, and problems in the program. It was as if communications were blacked out except along a few select lines and among a few preservation officers in Washington, DC.

Initial Meeting

As a result of my conversation with Connie Ramirez, Jim Maxon, the Bureau of Reclamation's Preservation Officer, agreed to sponsor a meeting to see about organizing the Federal agencies to improve communication among the Federal agencies. In December of 1989 a meeting was held at the Denver Federal Center.

The meeting was sponsored by eight Federal Preservation Officers, including Jim Maxon (now retired from the Bureau of Reclamation), Melanie Stright (Minerals Management Service), John Douglas (Bureau of Land Management), Evan DeBloois (Forest Service), Diane Gelburd (Soil Conservation Service), Constance Ramirez (U.S. Army), Kevin Kilcullen (Fish and Wildlife Service), Annetta Cheek (Office of Surface Mining), and by Douglas Scovill of the National Park Service. Some 25 agencies and 75 people attended the meeting. The two-day meeting on December 6-7, decided to organize the Federal Preservation Forum (FPF). A steering committee was established, and it prepared a proposed constitution and by-laws as well as a slate of officers and board members for the first official meeting of the Federal Preservation Forum on June 7-8, 1990. The National Park Service provided some secretariat functions and generously agreed to duplicate and mail the constitution and by-laws. It also maintained the mailing list of the FPF for the first 11/2 years of the organization's existence.

I was elected the first president of the organization and Evan DeBloois of the Forest Service became president-elect. The secretary-treasurer was Bruce Eberle of the Federal Highway Administration and Kevin Kilcullen of the Fish and Wildlife Service became secretary-treasurer-elect. The nine additional board members constituted a broad cross-section of the Federal CRM community in terms of agencies and geographic distribution.

Goals and Purposes of FPF

The purposes of the FPF are best stated in the constitution and by-laws of the organization.

The Federal Preservation Forum shall seek to enhance the quality, efficiency, and economy in, as well-as cooperation among, all aspects of Federal historic preservation programs through:

Constructive dialogue among the major participants in the Federal historic preservation program including: Federal Preservation Officers and their staffs, field personnel in Federal agencies, the programs of the National Park Service, the Advisory Council on Historic Preservation, the National Conference of State Historic Preservation Officers, the National Trust for Historic Preservation, and other groups and individuals.

Information exchange at meetings, training, workshops, in publications, and through other appropriate means in order to improve agency programs.

Awards and professional recognition programs.

Better and broader lines of communication between field personnel implementing the programs and policy-making personnel in headquarters offices.

Professional enhancement and the development of a professionally trained and recognized work force in the Federal historic preservation program.

Accomplishments

The second meeting of the FPF was held in Santa Fe November 13-15, 1990, under the sponsorship of the regional office of the National Park Service. Though several topics for action became obvious, the membership decided to limit its energy to the area of improving the Section 106 process. A committee jointly chaired by Diane Gelburd and Jerry Wylie of the Forest Service was appointed. That committee met in Denver in February of 1991 and reported on its progress to the board in June of 1991. The board agreed to proceed with the program, and the committee was to contact the Park Service, the Advisory Council, and the NCSHPO to propose a working conference on ways to improve the Section 106 process. To improve communication within the Federal preservation community, the FPF also began to develop a newsletter after the Santa Fe meeting.

In the meantime, a spring 1991 meeting sponsored by the National Park Service in coordination with the annual meeting of the NCSHPO in Washington, DC, highlighted that there is a considerable degree of discontent among the SHPOs and agencies over the way the

Federal CRM process now plays out. That discontent appears to be expressing itself in a generalized desire to improve the Section 106 process by finding ways to release participants from unproductive bureaucratic paperwork so that they can better manage cultural resources.

(Copies of the meeting report may be obtained by contacting Bruce Noble in the National Park Service at 202/FTS 343-9532.)

Since the Santa Fe meeting, the FPF met in Washington, DC, in June of 1991 and in Seattle in December of 1991. Each meeting has been designed to focus on discussion of timely topics important to the members. Discussions included such topics as curation (including 36 CFR 79 and the Native American Graves Protection Act), outreach to and education of the public, the National Register and its role in the program, various aspects of compliance with Section 106 of the National Historic Preservation Act, resources of use to CRM managers in the National Archives and Records Administration and the Smithsonian Institution, and so forth.

FPF's Future

The FPF continues to evolve and seek its proper role in the Federal preservation community by providing a forum for interagency communication and broad input from around the country into the Federal preservation program.

The FPF has done a good deal, although it could have accomplished more. Discussions among the membership at meetings are one factor that led the National Park Service to redesign its CRM Bulletin, to publish lists of CRM training opportunities, and to reorganize the way the National Register's staff interacts with Federal agencies. The redone publication, CRM, is significantly more useful to non-Park Service CRM personnel, and a representative of the FPF sits on its editorial board.

Committee work is important to the FPF, and it will become more important to the Federal preservation program as the organization matures. There is considerable discussion of how to improve the Section 106 process by all involved parties, and the FPF's Section 106 committee is an active participant in that discussion. A cooperative effort should result in a more functional and efficient Section 106 system. As a result of the recent Seattle meeting, it appears the FPF will establish new committees on curation issues and issues arising from National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties.

The Federal Preservation Forum has established itself as an effective means of communication and discussion among the agencies in the Federal historic preservation program.

To address limited agency budgets, the FPF board decided there will be only one general meeting in 1992. The FPF board selected Denver for the fall 1992 meeting because of its easily accessible centralized location. Support of mailings and determination of membership will now be based on a \$5 membership fee which will be implemented during the year. Newsletters and meeting announcements are sent to members of the Federal Preservation Forum (see membership information below).

Brit Allan Storey is the senior historian of the Bureau of Reclamation. He served as a caseworker on the staff of the Advisory Council on Historic Preservation for over 14 years before moving to Reclamation in 1988, and he is the immediate past-president of the Federal Preservation Forum. This paper represents the personal thoughts of the writer and does not represent positions of either the Bureau of Reclamation or the Federal Preservation Forum.

Windows on the Past

The Forest Service Works with the Public to Understand and Preserve Our Past...to Understand Our Future

**Linda Marie Lux
Leslie E. Wildesen**

We are in the midst of major cultural upheaval that at one and the same time is witnessing a tremendous loss of cultures and traditional knowledge, and the reemergence of truly multicultural societies in the world. The Forest Service, as a microcosm of this changing world, is a paradigm of the shift. In this context, the agency's Cultural Resource Management Program is striving to preserve cultural information and trying, in turn, to reach out and make it available to this new, diverse society.

Cultural resources hold the keys to understanding and appreciating our place in history, the relationship of people to the land, and the diversity and commonality of the human experience. Such understanding and appreciation will enable present and future generations to enrich their lives and better meet the challenges of an increasingly complex world. [Vision Statement, USDA Forest Service CRM Team, October 1990]

"Today, with little notice...vast archives of knowledge and expertise are spilling into oblivion, leaving humanity in danger of losing its past and perhaps jeopardizing its future as well." These words, which recently appeared in Time 1, describe the tremendous loss of knowledge and wisdom that is occurring as people voluntarily and involuntarily leave traditional lifeways to join modern "civilization." Likewise, the material evidence of traditional cultures and lifeways that have already been lost is in jeopardy. Archeological sites are vandalized and historic buildings are brought down to make way for development in an ever growing world. From these living and past cultures we might better understand how we maintained the delicate balance that ensures our existence, and where and how we have upset that balance. Forest Service cultural resource managers are working to preserve traditions and knowledge about past cultures. At the same time we are finding that diversity ethnic, cultural, and racial-in the United States is growing, and fundamental changes in the population makeup are creating a truly multicultural society with all of the benefits and turmoil that brings. Complex social and intellectual forces oblige us to redefine our society and to rethink the way we do business.

As a major land-managing and multiple use agency, the Forest Service is feeling the impacts of these changes. The major issues that will direct the Forest Service through the 1990s and beyond are:

- Increases in the need for long-term data on the relationship of humans to their natural environment;
- America's changing demographics, with resulting increases in demands for workforce diversity and for effective communications with all sectors of the public; and
- the rise of "adventure travel," including heritage tourism and learning/volunteer vacations (in part, a result of the first two factors).

Cultural resource managers, trained as archeologists, anthropologists, historians, and ethnologists, stand ready to make important contributions to these efforts.

Human Impacts on the Environment

More and more, archeological and historic sites are seen as sources of critical information and, therefore, important resources to be managed for the public. Other resource specialists are coming to us for historical data to help solve forest management problems. For example biologists and botanists look to cultural resource managers to provide historical data on the causes of vegetation changes through time. This information will be used, in one case, to better manage forest regeneration to meet spotted owl habitat needs. Hydrologists and fisheries specialists come to us for data on historical stream uses and conditions to develop rehabilitation programs and better standards for today's stream management. Cultural Resource managers have become major players in development of Land Management Plans that will guide forest management for the next decade.

New archeological tools will help us better understand human impacts on the land. Long-awaited technological developments in archeological research are coming to pass. New dating technologies, new ways of understanding taphonomy, sedimentation, environmental and social change, and new approaches to theory-building enable new kinds of information to be wrested from the ground. In addition, efforts to streamline and improve the effectiveness of legal compliance processes require new kinds of data about the actual effects of certain land management activities on cultural resource values.

Working and Communicating with Diverse Cultures

Workforce diversity and internal/external communications are two of the biggest issues facing the Forest Service today. Cultural resource program managers are important players in these arenas for two major reasons. First, cultural resources are the tangible evidence of cultural diversity in America. Second, cultural resource specialists, because of their training, are familiar with cross-cultural perspectives and the need to consider multiple points of view.

By locating, studying, and interpreting cultural resources, we are helping "tell the story" of the vast and continuing contributions made by diverse people throughout American history and prehistory. Big Sand Butte, a Modoc War site, tells a story of cultural conflict. Adobe Civilian Conservation Corps structures built with the expertise of Mexican artisans tell a story of cultures working together. Chinese mining sites at Lake Tahoe evidence the important contributions of the Chinese to the development of this country. The Beckworth trail across the Sierra Nevada, first established as an emigrant route by an enterprising Black cowboy, is interpreted on the Plumas National Forest, and the examples are multiplying. Interpreting the past is helping us better understand why cultures have evolved as they have, and why various peoples are attempting to revive and retain their cultural identities in the modern world.

The cross-cultural skills of cultural resource managers are proving invaluable in helping to design multicultural approaches to human resource, recreation, and interpretive programs. For example, many archeologists dealing with prehistory have experience and training in Native American cultures, and readily contribute to the Forest Service Native American Special Emphasis Program. This year a Forest Service Indian Policy Committee met with several California Indian basketmakers to establish partnerships between the gatherers and the Forest Service, and to foster the growth and management of basketry materials such as sedge, redbud, and beargrass. They hope as well to streamline the regulatory and permitting processes for this resource use.

The Rise in Heritage Tourism

Perhaps as an outgrowth of concern for the environment and cultural changes in our society, adventure/educational travel is one of the fastest-growing segments of the tourism industry today. Many people want to feel as though they are contributing something or learning something as they travel. Historical tours, "Earthwatch" type vacations, and physically challenging activities (such as climbing and mountain biking) attract these travelers.

Forest Service data show that "visiting prehistoric sites" is the second most popular current outdoor recreational activity in the United States (after backpacking); "visiting historic sites" is the sixth most popular activity, ahead of developed camping, visiting museums, wildlife observation, and driving for pleasure. Furthermore, this trend is projected to increase through the year 2040.

The national forests, spreading from Florida to Alaska and including Puerto Rico, contain extraordinary varieties of historic and prehistoric resources. Over the past several decades, cultural resource programs have enabled us to identify and protect many of these resources. Now we are working toward making them more accessible to people.

In an effort to reach the public, the Forest Service developed what is known as the National Recreation Strategy. This strategy focuses on communicating with the public about recreational opportunities on national forests, and one of its most important components is its Windows on the Past Program. This program emphasizes public outreach and interpretation of history and cultural resources through partnerships with historical societies, interpretive associations, universities, and other organizations. Partnerships are a key element in this program.

The Passports in Time Program (PIT) is a part of the Windows on the Past Program that helps bridge the gap between the resources and the public. The PIT program is modeled after a similar program in Ontario, Canada. It matches a nationwide corps of volunteers with archeological and historic preservation projects on national forests. These projects give volunteers hands-on opportunities to learn about the resource. They learn the techniques of archeology, restore historic buildings, guide other visitors through historical sites, interview CCC alumni, and a host of other activities.

Many of these efforts are interdisciplinary. The Forest Service CRM program is working in cooperation with Watchable Wildlife programs and other public education programs to provide environmental-vacation packages. One activity incorporates peregrine falcon counts with prehistoric ruins stabilization, for example.

Heritage tourism with its economic benefits may serve as an alternative to timber-based economies. With this in mind, the Forest Service is linking the development of recreational and heritage experiences with its program of rural development. In areas where timber production is waning, heritage tourism may generate income for local economies, and provide stability as well as civic pride. The keys to success will be local involvement in decisionmaking and respecting the carrying capacity of the local culture and the physical environment. It is recognized that tourism must not be allowed to obliterate the cultural and natural features that make an area unique and that people came to experience in the first place.

An Integrated, Well-Balanced Program

Addressing these three program areas has resulted in a more balanced and integrated program. The Forest Service CRM program is now more responsive to resource needs, agency needs, and public needs. We continue to meet Section 106 compliance requirements and protect the resource from vandalism and destruction, but we also meet Section 110 preservation and ARPA education needs by emphasizing enhancement projects through evaluation and public interpretation. We meet agency needs by providing technical support so that forest managers can make informed decisions, and by integrating cultural resource management into the land management process. We meet public needs by developing recreational interpretive opportunities, and by participating in interdisciplinary public education and awareness programs. That is a valuable role which was not filled in the past.

1 Linden, Eugene. *Lost Tribes, Lost Knowledge*. Time, September 23, 1991, p. 46.

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Cultural Resources Management in National Parks

Laura Feller

The National Park Service (NPS) was established in 1916 with a legal mandate to protect and preserve park cultural resources and to make them available for public enjoyment "in such manner and by such means as will leave them unimpaired for future generations." The fundamental mission for preservation and conservation was linked from the beginning to public appreciation and visitation. Thus park managers, like managers in other Federal agencies, balance a variety of needs. They set priorities not only for preservation of cultural and natural resources but also for visitor services, health and safety, and interpretive programs. In laws establishing individual parks, Congress may specify additional mandates for park management, but the primary reason for the existence of the national park system remains the conservation and protection of cultural and natural resources.

Today, one of the most important functions of NPS cultural resources management programs is to ensure that management decisionmaking processes are based upon adequate information about the whole spectrum of cultural resource values in parks. NPS practices for doing this have evolved over the years, based on legislation and professional practice and standards. Since the passage of the National Historic Preservation Act and its amendments, the mandates of Sections 106 and 110 of the Act, the growth of state preservation programs and the development of the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation have had a profound impact on cultural resources management in parks.

To assure that this program is conducted systematically throughout the national park system, NPS has developed a cultural resource management guideline (NPS-28). In addition to spelling out basic NPS practices with respect to survey, evaluation and registration, this document sets forth principles, goals, and procedures dealing with a variety of issues related to planning, research, and stewardship of cultural resources in the national parks. It provides a broad framework for meeting diverse cultural resource management responsibilities pertaining to the national park system. Currently the guideline is being revised to reflect developments in practices, policies, and programs.

While the NPS cultural resource management program consists of many facets, one of the most important responsibilities is to inventory and evaluate cultural resources within parks. (This can also involve recognizing historic and cultural relationships with resources that may lie outside park boundaries.) Meeting Section 110 responsibilities for nominating properties to the National Register is, of course, a primary part of this job. NPS has developed a number of inventory tools that aid in this process. They exist to ensure that we as an agency know about the resources that are entrusted to us by the public, that we make informed decisions about those resources, and that park programs as a whole are guided by the best possible "baseline" information about cultural resources.

One important repository of baseline data is the automated, evaluated inventory of park historic and prehistoric structures known as the List of Classified Structures (LCS). The LCS uses National Register criteria to evaluate whether structures are included, although it includes some properties, such as commemorative properties and reconstructions, that are not ordinarily considered to meet Register criteria. The LCS serves park managers and cultural resources specialists both to describe resources and to provide information for budgeting and program development. It is also an information source for the NPS Maintenance Management (MM) Program. A computerized Inventory and Condition Assessment Program (ICAP), which is a module of the MM program, is being developed for assessing condition, identifying maintenance deficiencies and providing corrective work procedures for park

assets. The automated Historic Property Preservation Database is also being developed, which will provide technical information to develop work procedures for ICAP and the MM program.

An important initiative is underway to address the need for adequate baseline data for park cultural landscapes. This year the NPS is initiating a Cultural Landscape Inventory (CLI) involving the participation of six regions. The CLI will be a computerized, evaluated inventory of all cultural landscapes in the national park system. The objectives for this year are a) to clarify the purpose and use of the CLI; b) to identify appropriate data elements and field survey techniques; c) to develop a strategy for identifying potential cultural landscape resources in each funded region; d) to manually test the CLI, evaluate the results, and revise the prototype inventory accordingly; and e) to initiate the CLI computer program development. Based on the results of the first year, completion of the CLI Servicewide will be pursued. This inception of the CLI represents the first attempt to identify the extent of the cultural landscape resources in the system and one of several initiatives related to identifying, documenting, and managing park cultural landscapes.

In the field of archeology, a Servicewide automated management database for archeological resources is in its fifth year of development. The database documents location, description, significance and management requirements of park archeological resources as well as site condition and threats to those resources. This year, a new program to systematically survey and evaluate archeological resources throughout the national park system was initiated.

The Servicewide Applied Ethnography Program is concerned with resources that reflect cultural diversity in national parks and with the people who traditionally use them. A major goal is to protect the cultural and natural resources that contribute to the cultural viability of Native Americans, African Americans and all other groups whose traditional subsistence or religious practices rest on those same resources. The resources assigned traditional significance by associated groups are identified for park managers and treated by the Service as ethnographic resources. The Applied Ethnography Program helps identify issues related to park ethnographic resources, provides technical assistance for culturally appropriate consultation with park-associated peoples, and designs and manages ethnographic research needed for park decisionmaking. Collaborative research in which applied anthropologists work in partnership with members of the study community is one of the program's hallmarks. Another precedent-setting activity is to systematically identify and respond to Native Americans' concerns related to protection of, access to, and the integrity of, sacred areas under Service stewardship.

At this takeoff stage in terms of funding and staff, three ethnographers recently joined NPS regional offices in Seattle, Denver and Santa Fe, and another ethnographer joined the NPS Washington office. They add to the staff already in the NPS Denver Service Center, several parks and Washington, DC. The Applied Ethnography Program is currently planning to train NPS staff in state-of-the-art techniques for rapid collection and analysis of ethnographic data for planning and evaluation purposes.

In the curatorial area, the NPS has a well-established system for cataloging baseline information about museum objects, and for defining what park museum collections should include through Scope of Collection Statements. A computerized cataloging system was implemented in 1987. Known as the Automated National Catalog System, this database now includes information on cataloged museum objects Servicewide. The NPS Museum Handbook provides guidance in documentation of collections throughout the national park system. A Servicewide initiative to eliminate the backlog of uncataloged museum objects and improve storage, preservation, security, and fire protection for collections in parks has been making significant progress. The goal is to bring the collections up to standard by the year 2000.

In the phased process of park planning, park staffs produce Resources Management Plans that set forth strategies for meeting basic needs for management of cultural and natural resources in their parks. These needs can range from filling gaps in baseline identification

and evaluation of resources, to budgeting for other research, and defining projects needed for resource preservation and protection. RMPs provide park and other NPS staff with the opportunity to analyze funding needs for the basic inventory and evaluation of cultural resources with the goal of ensuring that parks have, or have strategies to acquire, that information as a foundation for preservation and management.

The National Park Service has developed some unique approaches to meet the Section 110 mandate to comprehensively identify cultural resources, nominate them to the National Register, and to prepare plans for the management and protection of those resources. At Mammoth Cave National Park, a cooperative project was developed involving the park staff and the Kentucky State Historic Preservation Office. The project combined the State's understanding of cultural resources outside the park with the completion of a comprehensive survey within the park. The result was the establishment of a broad context that helped to facilitate the evaluation of park cultural resources. The park and the state are now working to fold this survey data into a programmatic agreement that will assure protection of the park's significant cultural resources through the Section 106 process, while streamlining the 106 review process.

In addition to such initiatives undertaken in "traditional" parks, NPS is also involved in cooperative efforts to provide planning advice or technical assistance in other settings. Some areas within the National Trail System, such as the Appalachian Trail and the Santa Fe National Historic Trail, exemplify these partnerships. NPS planners are also becoming involved in planning efforts that relate to regional or local efforts to promote land-use planning or heritage tourism. These are cooperative efforts that depend upon the states, local governments and citizens for successful implementation. Such efforts present a challenge to traditional NPS methods of planning for cultural resources when they involve regional or local planning issues rather than management of federally-owned parklands. That challenge can be especially acute in addressing needs for identification, evaluation, and documentation of cultural resources. One approach to this challenge was a recent congressionally-mandated study of southern West Virginia's coal mining heritage, where the State Historic Preservation Officer conducted a reconnaissance survey of historic properties related to coal mining as part of the study.

Inventory, evaluation and documentation of park cultural resources is, in some important ways, only the beginning of the job of stewardship and preservation. It is, however, the foundation for informed management and protection. The inventories outlined above are the essential first step toward building effective programs for cultural resources management.

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Intrigue of the Past

Utah's Archeology Education Program

Shelley Smith

We are all well aware of the cumulative effects of vandalism on preservation of the archeological record. People who collect surface artifacts, mine sites for salable artifacts, and deface rock art panels steal the past from us all. While there will always be a role for law enforcement, education is widely recognized as a long-term means of nurturing stewardship of cultural resources. With the goal of educating Utah students to take responsible and thoughtful actions toward their archeological heritage, the Utah Bureau of Land Management (BLM) directs an interagency archeology education program, Intrigue of the Past: Investigating Archaeology.

The program started in 1989, when the Interagency Task Force on Cultural Resources identified an education program as a necessary component of a vandalism-reduction effort. The Task Force is comprised of the Utah division of the BLM, representatives of the Forest Service and the National Park Service who work in Utah, and the State of Utah. The Intrigue of the Past program was developed by a team of educators and archeologists.

We started by collecting and evaluating the applicability of existing archeology education materials to our program goals, analyzing teachers' needs, researching values development, and building a network of educators and archeologists. In analyzing other programs, we discovered that there were many quality materials, but very few teachers were using them. Analyzing teachers' needs explained this phenomenon. Most programs assume a base of expertise that the majority of teachers don't have, or they assume the teacher has ample preparation and classroom time, and money for materials. To be widely and effectively employed, a program has to be readily usable by a novice and fit into the existing education structure.

We looked for a model of a successful widely used supplementary education program, and found Project WILD to be applicable. WILD is a program to educate young people about wildlife and related issues. An activity guide is provided to teachers free of charge, but they must attend a workshop to get it. In Utah, over 1100 teachers a year attend WILD workshops. A newsletter is sent to workshop participants.

We applied the principles of Project WILD's success to developing Intrigue of the Past, which has three main components. The first is an activity guide for the fourth through seventh grades, consisting of 34 lessons arranged into four sections. Each lesson was tested by several teachers, and revised. All materials needed are included in the activity guide, or are readily and cheaply available. The activity guide is given to teachers at workshops, the second component. Finally, on-going support is provided to teachers through periodic newsletters and a network of local partnerships with agency, contractor, and university archeologists.

Two aspects of program development are noteworthy: Native American involvement and values development. Each tribe in Utah was contacted and asked to talk with us about concerns Indian people have about archeology being taught in the schools, perspectives they would like presented, and appropriateness of some subject matter and materials. Their input was invaluable. Throughout the program, we tried to present both sides of sensitive issues, and to be inclusive of alternative viewpoints.

Our research into values development showed us that students in our target age group are of sufficient maturity and have achieved the developmental stage of wanting to think about and resolve issues. They enjoy thinking about alternative perspectives on a problem and want to be involved in meaningful and productive work. A teacher cannot "teach" values. Values are deeply held and personally defined. However, a teacher can give students neutral

and balanced information, and create opportunities for them to explore and refine their values. It is also important to assure that students know that for any problem that captures their concern, there are real ways they can make a difference. Included in the activity guide are lessons that provide several strategies for values clarification, as well as a creative problem solving model.

Implementing the program was facilitated by a partnership with the Utah Museum of Natural History, through Deedee O'Brien, teacher workshop coordinator. The museum hosted several Intrigue 10-hour workshops, and arranged for teachers to get in-service credit for attending. Participants tested program materials in their classrooms and gave us helpful feedback on improvements (archeologists also reviewed the materials and provided us with very useful suggestions). The museum workshops were effective in reaching teachers from the Salt Lake City metropolitan area, but to be successful the program had also to reach every corner of the state.

Together, BLM and the museum applied for and received a Utah Humanities Council grant to conduct a workshop for 70 teachers from around the state. The Archaeology Summer Institute was held in June 1991, and consisted of three days of workshop activities followed by two field trips. Teachers received a substantial five credits, and were required to do two things after the workshop: pair up with a local archeologist to conduct local Intrigue workshops for the teaching peers, and use the materials in their classrooms. Meanwhile, we conducted four workshops around the state for archeologists, to familiarize them with the activity guide and to provide guidance on working effectively with teachers and the educational system.

Eighteen local workshops have taken place, with about 250 teachers attending. We have looked at this initial round of local workshops as a scattering of seeds—some will germinate and grow and some will not. People have varying talents and interest in teaching their peers. Through observation and feedback, we are identifying those teachers who will be effective facilitators and are offering them further training and nurturing their interest. We will also be analyzing those areas of the state where we need to sow more seeds to develop a local program.

Currently, we are preparing a secondary level activity guide. It will undergo the same testing and evaluation as did the primary level materials. We are planning to prepare four short videos to complement both activity guides, and one video now in production.

We have had numerous requests for the activity guide, and this presents us with somewhat of a dilemma, because the guide is only one-third of the program. To be effective, a delivery system of teacher workshops, and ongoing support are crucial. At the same time, we want to be responsive to people's needs and to share what we have learned and had support to develop. The solution to our dilemma has come with BLM's ambitious new nationwide program in heritage education. Through this new program, Intrigue will have a vehicle to be exported, in total, to other interested states.

This is how it will work. This year, we will revise the activity guide to be generic to archeology anywhere. Three of the four sections of the current activity guide already are broad in application, including lessons on the topics of fundamental concepts, the process of archeology, and issues and values clarification. The other section is a series of essays written for children about Utah prehistory. The revised activity guide will be a foundation for the program anywhere it is applied. Each state will need to prepare a second tier to the program that reflects that state's unique cultural history and resources. We are developing guidelines to share what we've learned about preparing effective and interesting materials for students, and about connecting local resources to the program.

BLM will be able to sponsor Intrigue of the Past in most western states. Sponsors will be needed in other states. We are preparing a sponsorship packet outlining the necessary steps to administer a statewide program. It will build on established networks and programs where possible.

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The Cultural Resources Program of the Soil Conservation Service

Michael J. Kaczor

The mission of the Soil Conservation Service (SCS), an agency of the U.S. Department of Agriculture, is to provide national leadership in the conservation of soil, water, and related resources through a cooperative program that protects, restores, and improves those resources. SCS provides technical and some financial assistance to the public through more than 3,000 conservation district offices that generally follow county boundaries. A central SCS office in every state and U.S. territory is responsible for program delivery. These state offices are assisted by four regional technical centers and a national headquarters.

SCS has recently undergone dynamic changes with the aggressive application of customer service principles and technology development which is reflected in the direction of the cultural resources program. To help ensure that significant cultural resources are not adversely effected by its assistance activities, SCS has undertaken a number of initiatives.

A national cultural resources training program was developed and implemented in March 1990. The training materials consist of audiovisuals, study guide, leader's guide, and computer disk (mitigation simulation) that is packaged into eight modules. The first seven modules can be either self-paced or a group session, while module eight is an expert-led field session. The module topics range from why cultural resources are important, to policy and procedures, to field identification, and are designed to build upon one another, though each is individually complete in its subject area. The training program is targeted toward all SCS field employees, who are certified at the end of their training according to the abilities, skills and knowledge (ASK) levels outlined in the SCS Leaders Guide and State Action Plan.

Nationally, over 9,500 SCS employees are listed for training in the state plans, in addition to another 787 district, county, and state employees. Through the first two fiscal years of implementation, SCS has spent over \$161,000 of national headquarters funds to accelerate the cultural resources training program. This expenditure of funds has achieved definite results. At present, 46% of the SCS employees and 39% of the non-SCS employees have completed at least part of the training program. In addition, 28% of SCS employees and 22% of the non-SCS employees have completed all of the training modules.

As recipient of the Society for History in the Federal Government's "John Wesley Powell" historic preservation award in 1990, the SCS training program has now become a model for other agency programs and will have a profound impact on public education efforts in communities across the Nation. An evaluation of training objectives has showed that SCS employee skills and attitudes improved significantly after training. This improvement will enhance cultural resource considerations in working with the public. In addition, SCS training materials are being used by schools and universities. Special training materials are also being developed to consider, more sensitively, other cultures and certain legislative mandates, such as human burials and traditional cultural properties.

In order to address cultural resources considerations more efficiently in SCS planning operations, software called Field Office Cultural Resources Management (FOCRM) is being developed. This menu-driven, user-friendly software will integrate cultural resources into a SCS structured management system. It will function in three broad categories of planning, support, and documentation. Linkage to several databases to support planning will be provided, including Geographic Information Systems (GIS). GIS technology is being applied to SCS planning in Florida, Virginia, and Massachusetts in an effort to develop predictive assessments of practice impacts. GRASS software and statistical analysis is being used to generate sensitivity maps and probability models. The prediction of site features using Ground Penetrating Radar (GPR) is a specialty of the Soil Survey Staff, and includes

both international and national assistance activities. This technology has been especially useful in sensitive situations involving human burials.

Preventing erosion is a major activity for SCS, and our Plant Materials Centers (PMCs) have been responsive to other agencies and professionals for assistance in protecting archeological sites. Vegetation and information is developed at PMCs around the country specific to the soils and conditions that are locally prevalent. The first cultural resources site protection practice was developed by SCS in cooperation with the Forest Service Stewardship Incentive Program (SIP). This is the first cost-share practice for private landowners that specifically involves cultural resources.

Rural development activities by SCSs Resource Conservation and Development (RC&D) program also involve historic properties and landmarks, such as the Gatlin site in Arizona. SCS is also an active partner in the Four Corners Heritage Council, designed to promote tourism and economic development of cultural resources in that area.

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Preservation Planning on Army Installations

Constance Werner Ramirez

Eight years ago, the Department of the Army issued a regulation requiring all military installations with historic properties to prepare a historic preservation plan. The purpose of this requirement was to ensure that management of cultural resources was integrated into the overall real property management responsibilities of the installation. In order to be official, the plan had to be approved by the appropriate State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation. In this way, each plan was intended to set up the framework for compliance with the National Historic Preservation Act Section 110 and to anticipate the consultation required by Section 106. To date, approximately one quarter of the major (large) installations have developed or are developing a plan.

Since the Army has jurisdiction over a large number of places important in American history, preservation planning becomes a mechanism for responding to the public's interest in its history. As the oldest agency of the Federal Government, its own history is inseparable from the history of many states and communities. In addition, due to the nature of many of its activities, prehistoric and historic archeological sites have been preserved through isolation from urban development and large public works projects.

Today, the Department's inventory of cultural resources includes such properties as an early man site in New Mexico; settlements of 7,000 to 12,000 years ago in Indiana; colonial buildings in Maryland; American Revolution and War of 1812 defenses in New York; frontier posts in Kansas; historic archeological sites in upstate New York; a university in Washington, DC; the site of the first atomic bomb test in New Mexico; and a nuclear reactor in Massachusetts. In addition, almost half of the 10,000 historic buildings are quarters for Army families and compose a major portion of the historic district cantonments at about 45 installations. Still in their original use, these houses, usually built to U. S. Quartermaster Corps standardized plans, present an image of the 19th and early 20th century Army and Nation. Management of these buildings (houses, hospitals, offices, stables, barracks, and manufacturing plants), structures (bridges, hangars, and gantry cranes), and landscapes (military layouts, F.L. Olmsted designs, pioneer trails, and settlement patterns) plus thousands of archeological sites (on desert pavement, in basalt cliffs, as rock art, medicine wheels, fish ponds), and so forth is carried out at over 1,300 installations that encompass about 12 million acres located between Cape Cod and Honolulu.

The Army's historic preservation program (now more frequently called the Cultural Resources Management Program) was formally established in 1974 in the Office of the Chief of Engineers, U. S. Army Corps of Engineers. Although the Corps of Engineers Civil Works Program had begun to hire archeologists in the early 1970s, the Corps' military program first retained professional staff in 1977. Following the 1980 amendments to the National Historic Preservation Act, the Army developed a historic preservation regulation requiring installations to prepare an installation historic preservation plan. General guidance was provided, but the Army did not set forth a prescribed format. It recognized that the combination of different missions, different types of historic properties and different command structures would require each installation to develop a plan that best served the needs of the Army. Installations have responded in many ways.

The concept of an installation historic preservation plan started at Fort Bliss in El Paso, Texas, in 1978. Stretching over a million acres, the installation contains over 15,000 archeological sites plus a historic cantonment (the built-up area) that contains buildings and landscapes of the late 19th century. The last cavalry post to train with horses, it is now an air defense training center. Its historic preservation plan recognized the evolving nature of

cultural resources management based on increasing knowledge about the vast archeological record and the potential impacts of the mission, such as tactical vehicle training. As research projects have revealed more about the significance of sites as well as the identification and distribution of site types, the Army has amended its plan, priorities, and associated techniques for protecting significant sites. Over the years, the updating of the plan has occurred through nearly annual on-site meetings with the SHPOs of Texas and New Mexico, the Advisory Council on Historic Preservation, the Army, and interested parties such as the El Paso Archaeological Society.

The historic preservation plans for historic cantonments must often consider buildings built from the early 19th century to places associated with World War II and the Cold War. Although there were some issues dealing with inventories and level of information, most of the management issues relate to maintenance costs and adaptive uses to ensure that the buildings continued to support the installations' missions. At the Presidio of San Francisco there was an early effort to develop a portfolio for each historic building in which historic data, existing condition, and maintenance requirements were kept on cards. The maintenance requirements were keyed to a set of historic building maintenance standards developed specifically for the building materials and techniques found in the historic buildings at the Presidio. This was an easy-to-use system that could be up-dated by annotations on the cards as work was performed. Similar types of maintenance guidance with information on specific techniques, such as paint removal, was developed for Fort Benning, GA. A few installations that had only a small number of historic buildings (and often ones that had been built before Army acquisition of the property) undertook complete historic structure reports to guide careful preservation.

After experimenting with various inventory techniques, maintenance assessments, maintenance recommendations, and some maintenance plans, there was an opportunity to try putting it all together at the U. S. Military Academy, West Point, NY. Since all the Army's historic preservation plans needed the approval of the Advisory Council, the Academy turned to the Council for assistance. Under the direction of John Cullinane, senior staff architect, the Council developed a plan that consisted of three parts: an executive summary in a highly illustrated booklet; an object oriented interactive database (on Mackintosh HyperCard), and the appropriate computer hardware. The objective of the computerized database was to put everything the installation historic preservation officer would need at one place. By opening various files, called stacks, the operator can assemble the information required to make decisions regarding appropriate treatment, explanatory information for briefings, or for the SHPO.

Small installations have often been able to set their preservation policies and priorities in well-organized manual-style plans. The Louisiana Army Ammunition Plant set forth in a three-ring binder its installation cultural resources policies, goals, priorities and budgeting and staffing plan. The format is easy to read and easy to reproduce for use in meetings or to incorporate in other policy, program or project documents.

Fort Totten, NY, developed a plan in a strategic planning format that set out the goals, objectives, assumptions and ways to measure plan accomplishments. This New York harbor coastal defense has a long history and properties from a number of periods that have little relation to today's mission, primarily as an Army reserve center. This plan identified ways in which the installation should interact with both the surrounding community and with the community of military historians. A one-volume document, it engenders enthusiasm for the historic properties and points the way to responsible stewardship.

Many installations find it difficult to combine plans for the historic buildings in the cantonment and the archeological sites and few buildings in the training areas and open spaces. Fort Polk in Louisiana addressed the need to integrate protection of archeological sites with an intensive tactical vehicle training on fine and highly erodable soils. Through the plotting of site locations on maps used for developing training scenarios, Fort Polk land managers and military trainers could work together to avoid sites or to schedule intensive field surveys, data recovery or other mitigation required to reduce adverse effects and/or

enhance site protection. At Fort Hood in Texas, a series of field surveys and analysis projects over a 10-year period has resulted in a database of over 3,000 sites. This work has covered about 95% of the installation which is equivalent to a 100% survey since impact areas likely to have unexploded ordinance will not be surveyed. Based on this database, that exists in both a database management system and on Geographic Information System (GRASS) layers, Fort Hood has an approved installation historic preservation plan setting forth a management strategy to continue avoiding or protecting sites while continuing to improve site information.

The experiences at the approximately 40 installations that have undertaken an installation-wide historic preservation plan have revealed a variety of issues worth noting. For example, it was often difficult to incorporate management strategies for historic cantonments with those for archeological sites on the training areas. In addition, plans tend to differ the most depending upon whether the installation has a qualified cultural resources manager on staff. Installations such as Fort Bliss, Fort Hood, and Fort Leavenworth have plans that respond to annual work plans tied to actions that the staff can undertake. Far more common are preservation plans prepared under contract for installations without qualified historic preservation staff.

In the case of preservation plans prepared under contract, the plans tend to be more general and the specifics of how the work will be accomplished are not as precise. To try and overcome this, several alternatives have been tried. The Fort Polk plan was prepared by the Southeast Regional Office of the National Park Service which then assists the installation in executing the plan through a continuing contractual relationship. At the U. S. Military Academy, the Advisory Council has held repeated training sessions to show staff how to use the information in the computerized plan. Recently, the U. S. Army Construction Engineering Research Laboratory (CERL) has developed the next generation of the U. S. Military Academy plan. Operating on a UNIX-based system, the new program is called X-CRIS and allows operators to use a windows environment to bring together GRASS data layers, text, maps, scanned photographs, and CADD displays for analysis and management.

Ultimately, the success of any plan is the responsibility of the installation commanding officer. Like other Federal land managers, the commanding officer sets the policies and priorities on his installation. Those with an awareness of the value of cultural resources to their troops and the American people and of the capability of historic preservation plans to integrate the requirements of preservation with the requirements of the military mission ensure that there is adequate staff and resources for the appropriate level of stewardship. Instilling in our Federal land managers their responsibility for cultural resources is the most important goal that a plan can achieve.

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Evaluating and Documenting Traditional Cultural Properties

Jan Townsend

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For the past year, National Register staff have heard that in the West there is a lot of concern about National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties; specifics, however, have not been forthcoming. I had the opportunity at the December 1991 Federal Preservation Forum meeting to hear representatives of several Federal Agencies elaborate upon their interpretation of and concerns about National Register Bulletin 38.

I would like to take this opportunity to address some misconceptions that were expressed at the meeting.

Misconception 1: Traditional cultural properties are new. Traditional cultural properties are not new. Properties that are rooted in a community's history and important in maintaining the continuing cultural identity of the community and meet one or more of the National Register criteria have always been included in the National Register. National Register Bulletin 38 simply provides guidelines for evaluating and documenting the National Register significance of these kinds of properties. The National Register routinely prepares bulletins that elaborate upon how to evaluate and nominate specific kinds of properties. These guidelines are in addition to the more generic guidelines provided in National Register Bulletin 16A: How To Complete National Register Forms. The National Register, for example, will soon issue a bulletin on how to evaluate and nominate mining properties. This does not mean that mining properties will be a new kind of National Register property—they will not; many are already listed in the National Register. Because mining sites have particular characteristics that are not commonly associated with other kinds of historic properties, however, the National Register recognizes the need for, and will issue a bulletin that specifically deals with, evaluating and nominating mining properties.

Misconception 2: National Register traditional cultural properties can be intangible. To be eligible for listing in the National Register of Historic Places, a traditional cultural property has to be tangible. In other words, one must be able to locate the property (i.e., site, district, building, structure, or object) relative to a place or places. For the purposes of National Register evaluation, practices and beliefs are not properties. Practices and beliefs help define the significance of the property. These practices and beliefs must be traditionally and directly associated with the property or place. National Register Bulletin 38 specifically states that "...the National Register is not the appropriate vehicle for recognizing cultural values that are purely intangible...." Note that Section 106 applies to properties that are listed in or eligible for listing in the National Register (i.e., tangible properties).

Misconception 3: National Register Bulletin 38 changes Federal agency responsibilities under the National Environmental Policy Act (NEPA) and the American Indian Religious Freedom Act (AIRFA). The guidance in National Register Bulletin 38 does not change a Federal agency's responsibilities under NEPA or AIRFA. Under NEPA, Federal agencies are responsible for public involvement, which normally includes contact with interested parties (e.g., specific ethnic groups, Indian tribes, etc.). AIRFA provides that: "... it shall be the policy of the United States to protect and preserve for American Indians their inherent right for freedom to believe, express, and exercise the traditional religions of the American Indian, Eskimo, Aleut, and Native Hawaiians, including but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonies and

traditional rites." Under this law, Federal agencies are responsible for evaluating their policies and procedures with the aim of protecting Native American religious freedoms. In carrying out their responsibilities under this act, Federal agencies may identify tangible properties that meet the National Register criteria. These properties are candidates for Section 106 review. The intangible properties that they identify will not meet the National Register criteria, and, thus, are not included in a formal Section 106 review process. This does not mean, however, that these intangible properties should be excluded from any consideration upon the part of the Federal agency.

Misconception 4: National Register traditional cultural properties can be of unlimited size. Traditional cultural properties that meet the National Register criteria must have definable and justifiable boundaries. This is a requirement of all properties listed in, or determined to be eligible for listing in, the National Register. National Register Bulletin 38 recognizes the difficulties of establishing boundaries for traditional cultural properties, but boundaries are mandatory.

Misconception 5: National Register traditional cultural properties can be only a few years old. Significance ascribed to a property only in the last 50 years cannot be considered traditional. Use (or proscribed non-use) of a property does not have to be continuous but generally must have started more than 50 years ago.

The subject of traditional cultural properties generated considerable emotion on the part of some of those attending the December meeting. My impression is that the subject of traditional cultural properties is requiring considerable attention on the part of Federal agency cultural resources staff. In contrast, in the past year only one disputed determination of eligibility for a traditional cultural property has been submitted to the National Register for formal review, and that property is not a Native American site. On the positive side, this shows that the states and Federal agencies are arriving at consensus decisions on the eligibility of properties without Washington's involvement. On the negative side, in this case, it also means that National Register staff remain unaware of the specific problems that states and Federal agencies are having with regard to evaluating traditional cultural properties and using National Register Bulletin 38.

To help remedy this situation and to provide better service to the Federal agencies, the National Register would very much appreciate it if Federal agency cultural resources staff would write and describe the general and specific problems or issues associated with evaluating and nominating traditional cultural properties. Federal agency staff also should consider submitting formal determination of eligibility requests to the National Register. We can then use the information to compile an addendum to National Register Bulletin 38.

Also, National Register staff welcomes calls for advice and assistance. Reviewers have specific regions: Western states—Toni Lee; Midwestern states—Beth Boland; Southern states—Marilyn Harper; Mid-Atlantic states—Patrick Andrus; and Northeastern states—Beth Savage. As the archeologist, I deal with all the states. Carol Shull is the chief of registration. You can reach any of the National Register reviewers and Ms. Shull by calling 202-343-9536. The address is U.S. Department of the Interior, National Park Service (413), P.O. Box 37127, Washington, DC 20013-7127.

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Have You Dug Up Anything Neat? The Role and Function of the Interagency Archeological Services Division, NPS, Southeast Region

John E. Ehrenhard

The Interagency Archeological Services Division? Hey, that sounds interesting. An Archeologist! WOW! I always wanted to be one of those. What do you do? Have you dug up anything neat?

When people ask me what I do, I hesitate, wondering how best to respond. This simple question has no simple answer. How can I explain the role of the Interagency Archeological Services Division (IASD) to people with little or no understanding of cultural resources management? Simply reciting legislation, chapter and verse, can be boring to the unsuspecting. So...what is my job? What does IASD really do?

IASD's Place in the Big Picture

The Federal Government has been involved in the preservation of the Nation's cultural resources since the 19th century. Many laws, executive orders, and regulations have been passed to achieve this goal. Over the past few decades, the government's commitment has grown dramatically. The present Federal Archeology Program was designed to oversee and assure effective management of archeological resources as part of our cultural heritage. Different agencies, however, have different ideas on the execution of the numerous laws and executive orders. Many developed their own cultural resources programs with one or more archeologists and historians on staff. Other agencies had no cultural resources staff and were thus unable to adequately undertake and administer cultural resource projects "in-house".

Enter the National Park Service with its interagency archeology program. Established in 1975 and administered through the Archeological Assistance Division (AAD) in Washington DC, this program was structured, among other things, to assist other agencies (Federal, state, local, and private) that have limited or no staff with archeological expertise.

While the principles of resource preservation have remained intact over the years, AAD programs have evolved in response to regional needs and differences. Today archeological centers are located in Anchorage, Denver, Philadelphia, San Francisco, and Atlanta—the home of IASD. As one of six divisions in the region's Office of Cultural Resources, IASD staff oversee archeology in the Southeast.

IASD Close-up

Behind all of IASD's projects is the underlying philosophy that we, as stewards of our Nation's heritage, have a public trust to preserve resource values in our communities. We recognize that long-term preservation can only be accomplished through increased understanding of and sensitivity to archeological resources and activities. Our mission, therefore, is to educate; to foster in others a feeling of ownership in and mutual responsibility for our common heritage; and to increase awareness of problems relating to cultural resources. Our message is quite simple. All of us—archeologists, land managers, the general public—have an impact, positive or negative, on our non-renewable archeological and

cultural resources. Our actions do have consequences that affect not only our present, but our past and future as well.

In a 1989 report, *Taking Hold of Our Future*, James M. Ridenour, Director of the National Park Service, asked for assistance and ideas to meet the challenges of the 21st century. This became the catalyst for re-examining our operating strategy. Communicating principles of cultural worth to a growing population with more diverse ethnic and minority influences than ever before; developing and implementing techniques for effectively preserving and protecting both our cultural diversity and what remains of our collective heritage; and, with regard to human resources, operating the finest archeological assistance program in the National Park Service—these are major commitments of IASD. But how do we respond to our challenges and commitments working within the mandates of the Federal Archeology Program?

The "How"—Programs and Plans

Cultural Resources Management Plans

Among IASD's most effective tools are Cultural Resource Management Plans (CRMPs). These master plans give managers sufficient data and guidance to make sound, informed decisions regarding cultural resources both known and, as yet, undiscovered. Besides dealing with planning and implementation, they outline specific processes and procedures, such as those for making nominations to the National Register of Historic Places and handling emergency discoveries and discoveries of human remains.

IASD identifies agencies with little or no cultural resources training or experience and through CRMPs helps them:

- identify programs and actions that will affect significant cultural resources;
- make recommendations for appropriate courses of action;
- assess options and alternatives;
- fulfill legal and regulatory cultural resources responsibilities; and
- evaluate effects.

But why do IASD and benefiting agencies find CRMPs so attractive? "Quite simply, because (they deal) with resources collectively, rather than on a case-by-case or site-by-site basis" (Anderson 1992). Furthermore, they are dynamic and ongoing. Most important, these cost effective plans contribute to and foster a feeling of ownership and responsibility among participants.

Paralleling CRMPs is our regional Archeological Site Stabilization Program (ASSP). We recognize that "in an absolute sense, the preservation of archeological sites is an unattainable goal but that techniques and procedures are available to retard losses to site integrity" (Thorne 1991). With this in mind, we canvass regional parks to identify effective techniques for archeological site stabilization and protection. Then, in conjunction with the University of Mississippi, we actively develop methods and techniques for stabilizing and preserving archeological properties. Integral to our stabilization work is the dissemination of information regarding the projects through articles and publications.

IASD has established working agreements with academic institutions (using undergraduate and graduate study programs), Federal agencies, private organizations, and private citizens for conducting investigative activities both within and outside the Southeast region. This successful and cost-effective program has led to a mutually beneficial exchange of site stabilization protection data and technology.

Public Outreach and Education

IASD continually seeks opportunities to increase public involvement in the archeological experience. Education, we believe, is the keystone. When given the opportunity to learn and understand, most people support archeology and archeological preservation.

Through our public outreach and interpretation initiative and in cooperation with Federal, state and local organizations, we create innovative public displays, give lectures, publish brochures and other literature, and participate in school programs.

Our challenge is to reach out to the national community and involve it in the rich diversity of the human experience. Through educational programs, we provide a viable framework for understanding why our American heritage is an important part of the record of human existence on this planet. In demonstrating the interdependency of the past and present, we illustrate how we are safeguarding our future.

Yeah, being an archeologist is rewarding and I have dug up something neat. Just the other day, I found another organization interested in protecting the past, managing the present, and investing in the future.

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For more information about IASD programs, write to: National Park Service Interagency Archeological Services Division, 75 Spring Street, S.W., Suite 1140, Atlanta, Georgia 30303.

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Federal Contracting Cultural Resources Management

A Contractor's Perspective

Rick Minor

During the early years of cultural resources management (CRM) in the 1970s, Federal contracting for CRM services primarily involved individual researchers or research units based in university settings. As CRM evolved as a discipline during the 1980s and into the 1990s, however, Federal agencies have grown to rely heavily on private contractors to conduct archeological and historical studies required under Federal law.

The role played by private CRM contractors has grown over the last two decades for a number of reasons. Many university-based archeologists and historians have research interests in other topical or geographic areas, and local cultural resources may hold limited interest. Even if they are interested, many university professors are too busy with teaching and other research to keep up with local and regional developments in CRM.

As well, with the decline in funding for higher education, fewer university positions are available, leaving a surplus of highly qualified archeologists and historians looking elsewhere for employment. Since many of these individuals carried out research for their master's theses and doctoral dissertations in regional archeology and history, they developed an interest and commitment to local cultural resources not always shared by their university advisors.

The extent to which private CRM contractors make their living from Federal contracts versus private sources varies widely from state to state. In states with relatively little Federal land where laws have been enacted providing for the protection of cultural resources on private property, private developers may be the primary sponsors of CRM activities. On the other hand, in states containing large amounts of Federal land that lack legislation protecting cultural resources on private land (such as Oregon), Federal agencies probably represent a primary funding source for CRM work.

Many, if not most, private CRM contractors will probably agree that it is generally preferable to work for a private client than it is to contract with the Federal Government. To begin with, there is the simple matter of respect. Whether working separately or as part of an interdisciplinary research team preparing an environmental impact statement or other management document, CRM contractors working for private developers are generally treated as professionals on a level with engineers, biologists, and other scientists. In comparison, CRM personnel employed as contractors to Federal agencies are not uncommonly regarded as on par with relatively unskilled temporary laborers.

Another important reason why working for private clients is preferable to working as a contractor to the Federal Government is that private clients sometimes pay higher rates than possible under Federal contracts. In addition, most private clients are more likely to pay on time than is the Federal Government. The so-called Prompt Payment Act prohibits any payment by Federal agencies until after 30 days of invoicing. In reality, it may take months to receive payment. Timely payment is not an inconsequential matter to private contractors operating as small businesses.

Perhaps more importantly, it is relatively easy to build long-term working relationships with private clients. This situation makes it possible in many cases to obtain new business as a regular supplier of services, without having to repeatedly prepare proposals for every job. In comparison, the Federal contracting system is designed to militate against the development of close working relationships between Federal agency representatives and private contractors. While the Federal contracting system is intended to ensure fairness to all, it also

discourages private contractors from investing time and money in a relationship with less potential for long-term gain.

Most Federal contracts are awarded on a competitive bid basis. Generally speaking, Federal contracts involve either a request for quotations (RFQ), or a request for proposals (RFP). In the case of RFQs, once minimum qualifications are met, contracts are generally awarded on the basis of low bid. This procedure is obviously intended to obtain services to the Federal Government at the lowest possible cost. Low bid awards may be appropriate for procuring certain types of services, but they are rarely conducive to obtaining quality CRM work. Indeed, in my opinion, the award of contracts on a low bid basis has been a major contributing factor in the inconsistent quality of fieldwork, analysis, and reporting of CRM projects on Federal lands.

In the case of RFPs, contracts are awarded on the basis of the best proposal, considered in conjunction with what is considered the most appropriate cost estimate. This procedure should, theoretically, enhance the probability that the Federal Government will hire the best contractor for a particular project. While perhaps offering a fairer shake for bidders, the RFP process has some major drawbacks for private consultants in that the preparation of competitive proposals requires a significant investment of time and energy. Even if successful, the contractor is rarely compensated for income lost while preparing proposals.

In contrast to the use of RFQs and RFPs, some Federal agencies have recently begun hiring CRM contractors under indefinite services contracts. Under these contracts, bidders submit proposals citing their experience and qualifications, as well as their rates. The agency then selects a contractor, generally for a one-year period, with annual renewal options of two to five years. All subsequent work orders are simply negotiated between the agency contracting officer's representative and the contractor. In the event the contractor selected performs unsatisfactorily, the agency simply declines to renew the option, and begins the process of selecting a contractor all over again.

Indefinite services contracts offer tremendous advantages to both Federal agencies and contractors. In removing the necessity to put each project out for bid, indefinite services contracts streamline the contracting process, saving time and energy—and therefore money—for both the agency and the contractor. Another advantage of indefinite services contracts is that an agency has a contractor "on call" for responding to emergencies (e.g., accidental exposure of human skeletal remains). Finally, a more intangible, but nevertheless important, advantage of indefinite services contracts is that they tend to impart a feeling among contractors of working with, not just for, the Federal agency.

Looking ahead, the role played by private contractors in CRM will probably continue to expand. There are now a number of private CRM contractors, mostly small, regionally-based firms, that are entering their second decade of existence. In comparison, there are relatively few Federal archeologists and historians who have stayed in their same positions that long. Under these circumstances, private CRM firms may provide continuity in terms of research experience in particular geographic regions that is often unmatched by the local CRM personnel employed by Federal agencies.

With the decline in grant funds for so-called "pure" research, an increasing proportion of archeological and historical studies undertaken in the future will very likely be carried out under the auspices of CRM. The quality of CRM research has improved over the years with the addition of highly qualified archeologists and historians to the field. Over the long run, cultural resources on Federal lands can only benefit from the involvement of more high quality personnel, both as private CRM contractors and as in-house Federal CRM personnel.

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The Business of Consulting

Clayton B. Fraser

Historic preservation has been so widely institutionalized in government that a private industry has developed to service its practical needs. As an industry, cultural resource management is minuscule, and it is attended by a large number of unpaid participants. But for some, cultural resource management is a business that follows financial and legal rules just as closely as it does the Secretary of the Interior's standards.

As the principal of two consulting firms, I have been involved with a wide range of research projects and contracting situations. One of the firms conducts environmental research; the consulting for it deals primarily with providing environmental site assessments for real estate transactions. The other company is involved with aspects of cultural resource management (CRM) centered around history and architecture. Typical of most CRM consultants, the work undertaken by the latter firm primarily entails evaluation and mitigation of adversely affected historic properties. This may involve preliminary survey and determination of National Register eligibility or mitigation planning and HABS/HAER documentation. Our experiences have been specific, but the conclusions that can be drawn from them can be applied broadly.

Our cultural resource clients are typically government entities—on Federal, state and local levels. Since much of our work concerns the history of technology, our clients tend to be agencies that manage technological sites such as bridges, dams, and transportation facilities. These include the Bureau of Reclamation and Army Corps of Engineers, state departments of transportation, county engineers and the major Federal land management agencies such as the National Park Service, Bureau of Land Management, and the Forest Service. What we have to offer as consultants is expertise on this rather narrow topic; our products are usually research reports of varying types.

The agencies approach CRM and contracting with a wide range of expertise and expectations. At one end of the spectrum is the National Park Service itself, which not only contracts for different components of CRM; but also writes and enforces the rules, reviews and approves CRM reports, and—in some cases—directs the SHPOs' responses to projects. The NPS branches typically know exactly what they want in a CRM project. Contracting under these circumstances is a relatively straightforward matter, subject to minor variations in contract format and administration. Since many of the projects we have undertaken for the NPS have entailed some untried aspects of methodology, our experimentation in research and documentation methodology have sometimes become as important as the final products. We attend a lot of meetings on these projects.

At the other extreme is a county engineer contemplating the demolition of a historic bridge and unfamiliar with the Section 106 mitigation process. Buffeted by the state department of transportation, the Federal Highway Administration, the State Historic Preservation Office, the Advisory Council on Historic Preservation and the National Park Service, many such engineers are both confused and angry by the time they contact us to do the mitigatory documentation. They know what they want to do: replace the bridge with a minimum of time and expense. Usually unhindered by preservation considerations, they do not understand the steps involved, however, and are frustrated with a process that is designed to delay construction to allow time to seek preservation alternatives. In these situations we try to inform the clients about the process and guide them through the steps, often dealing with the various regulatory agencies in their behalf. Government agencies at this level are primarily interested in securing clearance to proceed with construction. Issues of methodology, and even documentation quality, are often secondary. Contracting under these circumstances tends to be almost exclusively product-oriented. As a result, our only client contacts sometimes occur at the beginning and the end of the project.

In most cases, the agency or agencies that review the reports are different from the contracting agency. In CRM, the SHPOs and the various NPS offices are most often the reviewing agencies. Usually, the client and the reviewing agency have similar requirements, if for no other reason than the client wants the project approved expeditiously. These requirements, in the case of the NPS agencies and some SHPOs, are specified in bulletins and manuals. Sometimes, however, the client tailors the research design to fit other needs, such as education or site interpretation. In this lies both the opportunity and the challenge for these projects. The opportunity is that we can depart from well-defined survey, research and report guidelines and can experiment with innovative techniques and formats. The challenge is that the additional contract requirements are sometimes not as well thought out as the standard elements. For instance, one client has requested that we prepare an educational slide show as part of a survey project, but the contract does not include field photography. We are still trying to figure out how to get the photos made.

The projects we undertake vary from single-site documentations to surveys involving over 20,000 sites spread over an entire state. With such a big difference in the scope of work and the nature of the contracting agencies, the types of contracts vary. Contracts for small projects are typically structured on a lump sum basis, also called "firm fixed price" by Federal agencies. The requirements for these projects are usually small in scale and clearly defined, making a fixed price easy to negotiate and fair for both parties. The type of contract used by Federal and state agencies for larger projects is structured on a cost-plus basis (actual costs plus a predetermined, fixed fee), usually with a maximum allowable amount. The scope and cost for this type of project are less certain at the outset when the contract is being negotiated, and the cost-plus contract is the most equitable vehicle to address these uncertainties.

Contracting with government agencies is a relatively direct process, once the rules of the game are clear. The problems that arise are rarely with the contracting agency—after all, the client is always right—but rather with the inconsistent manner with which the reviewing agencies evaluate the reports. There is an emphasis placed on the form of these reports, rather than on their content. This is made even worse by the fact that the rules of format are enforced differently from agency to agency, from reviewer to reviewer, and even from the same reviewer on different days. The problem is endemic with the entire CRM industry and is not limited to a single state or Federal agency.

The erratic enforcement of rules is a sign of success for the CRM business, for it indicates, in part, the overwhelming amount of work now being handled by the reviewing agencies. This success is a dubious one, however, when rules enforcement overshadows the fundamental intent of historic preservation. The danger in this is that form has come to supersede substance. Our environmental clients would never tolerate the way that CRM projects are currently reviewed. Similarly, local officials may often lack the sensitivity to preservation issues, but they do understand the need for consistency in contracting and project review. Cultural resource management does not need to be esoteric to be effective.

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Viewpoint Where To Now?

Brit Allan Storey

The recent 25th anniversary of the National Historic Preservation Act presents the opportunity to reflect on where we are and where we need to go in the Federal CRM program. In 1966 Congress passed the Act in response to growing discontent among Americans about the environmental impacts of Federal and federally-supported projects. Two basic types of Federal agencies deal with the Act—land-managing agencies and non-land-managing agencies.

Most Federal land-managing agencies have come a long way since 1966 in their approach to dealing with archeological, architectural, historic, and cultural properties. I suggest that the land-managing agencies with responsible programs are ready to push the evolution of the Federal CRM program further.

Federal land-managing agencies are ready to develop a comprehensive programmed approach which permits better management of cultural resources in their custody for the benefit of the American people. I also suggest that the current program is most suitable for either granting agencies or land-managing agencies that do not attempt to manage their resources on a comprehensive and proactive basis. This is the case because the current program details a step-by-step process for CRM planning that was developed to respond to projects affecting individual buildings or sites. However, this program does not meet the needs of large land-managing agencies. In these agencies, a CRM program that emphasizes only project impacts will necessarily ignore the larger universe of cultural resources not threatened by any pending project.

Cultural Resources Management (CRM) has grown, evolved, and coalesced in the quarter century since the passage of the National Historic Preservation Act. Several major constituencies participated in the growth of CRM: the National Park Service's external historic preservation programs, the Advisory Council on Historic Preservation, the State Historic Preservation Officers, the Federal agencies (including the internal National Park Service programs), and the American public. Each of these constituencies should continue to be involved in the program as it evolves. While there is no agency which perfectly implements its CRM responsibilities, most land-managing agencies have professionally trained staff members—many are putting serious staffing and funding into CRM programs.

What we now need is a way to permit continued healthy evolution of the Federal historic preservation program. The CRM program is in danger of stalling and falling into stagnation. The Advisory Council's first procedures for obtaining its comments were a few typescript pages published in the late '60s or very early '70s. Those were followed by published revisions in the Code of Federal Regulations in 1974, 1979, and 1986. What is striking about the evolution of the Council's guidance/regulations in all these incarnations is that the general outline and intent has changed very little. What has changed is that more and more loopholes have been plugged in the interest of assuring that Federal agencies comply with the spirit and letter of the intent of Section 106 of the National Historic Preservation Act. This is a natural process. At first we try an approach to a complicated issue, and then we correct the approach to solve the deficiencies that are found. The problem with this approach is that it tends to keep attention focused on the deficiencies and problems with the original approach and it does not permit effective consideration of whether the entire original approach was on-track or needs to evolve yet further. Other components of the Federal CRM program have evolved along the same general lines. While this is a natural evolutionary process, I have to wonder if the program isn't simply evolving into gridlock.

The National Register of Historic Places is another component of the program which developed a life of its own. The National Register, through the Federal, state, and local legislative processes, has naturally accreted functions not originally intended for it. In many areas it now has legalistic implications—either real or perceived—for property ownership, taxation, property development, and a host of other topics which, combined with the natural evolution discussed above, convolute National Register nomination and review. It is a tedious nomination process which many Federal agencies avoid at all costs rather than make the necessary investment of time, energy, and money. There are, of course, exceptions to this approach among Federal agencies, and some agencies nominate properties to the National Register for specific management or honorific reasons. The result, however, is that neither the National Register nor any other list gives Americans a comprehensive view of significant properties in the United States; nor does the Register or any other vehicle provide a well-rounded planning vision of where money and energy should go into CRM in this country.

An issue that cries for reexamination is whether or not the Federal program as it has evolved results in the effective, efficient use of CRM monies in the best interest of the American public. In one way or another, there is continual tension over the fact that in almost all instances the existing CRM program requires a Federal action or project to trigger investment of time, money, and staff in management of historic properties. This tension shows itself in several ways: the "best" federally-owned archeological and historic properties often don't receive attention; lesser properties are protected, restored, rehabilitated, or excavated because there is a Federal project; and there is no overall synthesis of the information gained from the historic preservation program. For granting agencies, it is appropriate to emphasize properties affected by projects. But this project-driven emphasis in the existing Federal program skews the management of federally-owned properties. It seems logical that the landmanaging agencies should identify and assess the significance of the properties they own and focus their time and money on the most significant of those properties. Instead, emphasis is often placed on less significant properties while significant ones deteriorate because they aren't affected by a project.

All of this occurs because of the ultimate irony of the program that has evolved through Federal agency implementation. The Federal "cultural resources management" program does not focus its time, energy, and monies on cultural resources. Instead, it focuses those resources on projects. In point of fact, this irony extends even further because there is an often overlooked tension in the National Historic Preservation Act between Section 106 and Section 110. The broader preservation planning and protection features of Section 110 are generally ignored or overlooked when it comes to allocation of staff, energy, and budget while by far the greatest allocations flow to implementation of responsibilities in Section 106. On December 5, 1991, Evan DeBloois, president of the Federal Preservation Forum, expressed some of the CRM managers' concerns that focus on this issue at the Federal Preservation Forum meeting. He said, "The 106 process works well if your goal is to produce paper. If your goal is to protect cultural resources, it doesn't do that."¹ I don't totally agree with Dr. DeBloois' point, but I do believe it illustrates the frustrations that many Federal CRM personnel have because they cannot effectively implement Section 110 responsibilities.

I suggest that the direction of the program needs to evolve so the primary focus of Federal land-managing agencies' resources is the overall health of historic properties in Federal ownership. The issues are very complicated, and in the end some system will probably evolve which combines dealing with the project impacts on the one hand and dealing with comprehensive planning and protection of important cultural resources on the other hand.

We, as the CRM community, must identify issues for reconsideration. A few of the issues I identify for reconsideration and discussion in the program are:

- Reconsideration of the entire archeology program. The important sites in Federal ownership must be protected regardless of whether a Federal undertaking affects them—given limited resources, this may mean considered destruction of lesser sites affected by Federal undertakings.

- Instead of dealing only with archeological sites affected by Federal undertakings, redirect the program to fill data and information gaps and facilitate comprehensive syntheses.
- Publish historical and archeological synthetic studies in two formats—one aimed at CRM professionals and one at the general public.
- Devote more attention to historic properties which can practicably be saved and protected.
- Put some history back into "historic preservation." We must demonstrate how historic preservation contributes to America's knowledge of its history as well as contributing to psychological well-being by preserving a sense of place and identity.
- Creatively release CRM professionals from paperwork to permit the Federal agencies to go "beyond Section 106."
- Better balance the professional expertise in the Federal program so that agencies do not hire archeologists to the exclusion of historians and historical architects, or, "architectural conservators" to the exclusion of other expertise. This particular issue is well exemplified even in the National Park Service (which I consider to be the best-balanced agency in the Federal Government in terms of professional expertise) by the fact that there is an Archeological Assistance Division in the National Park Service with a Departmental Consulting Archeologist. That high profile is not given to the other professional expertise intimately involved in the Federal CRM program. There should, instead, be a Federal Cultural Resources Management Assistance Division with three branches headed by a Departmental Consulting Archeologist, a Departmental Consulting Historian, and a Departmental Consulting Historical Architect.

In its first 25 years the program has established strong foundations, but those foundations now confine the program as much as they undergird it. The Federal agencies generally do not have comprehensive programs which serve cultural resources well. Instead, they have programs aimed largely at dealing with current undertakings. It is time to consider letting Federal land-managing agencies redirect their programs. That redirection may mean that lesser properties are destroyed while protection is redirected to assure the most benefit for the American public and CRM as a whole. I suggest we consider means of protecting the most important Federally owned properties and redirecting and invigorating intellectual efforts for effective, economical, efficient, and comprehensive understanding of America's past. The current challenge is to save components of the program that continue to offer useful benefits, but to find new ways for the Federal CRM program to evolve in radically new directions. I suggest some mechanism such as a working conference or working groups of professionals representing all the components of the program—from Department officials to Preservation Offices to field personnel. Of vital importance to the success of such a conference will be the presence of field personnel who continually implement CRM responsibilities as they now exist.

This paper is intended simply to stimulate discussion and present one perspective on these complicated issues. Only through a conference, working groups, or some other vehicle for establishing effective dialogue, can the many perspectives and issues be properly surfaced, discussed, and culled. It is time for the Federal agencies (including the internal programs of the National Park Service) to actively participate with the Advisory Council, external programs of the National Park Service, and State Historic Preservation Officers to set new directions for the Federal CRM program which are responsive to everyone's programs and better fulfill the public trust implicit in the program.

1 Speaking at the Federal Preservation Forum meeting in Seattle, Washington, December 5, 1991.

Brit Allan Storey is the senior historian of the Bureau of Reclamation. This paper represents the personal thoughts of the writer and does not represent positions of either the Bureau of Reclamation or the Federal Preservation Forum, or of *CRM*.